

MOSER LAW FIRM, PC



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August 5, 2024

Via Email to

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KALMANSON COHEN PLLC

165 Broadway, 23rd Floor

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Re: *Galvan v Rolling Lawns, Inc et al.*, 7:23-cv-06724(CS)  
Our File No.23-00018

Dear Counselors:

I am writing following review of the Plaintiff's "Second Supplemental Responses and Objections to the Defendants' First Set of Interrogatories" dated August 2, 2024. The 1st Interrogatory sought "a detailed description of the subjects" of the information possessed by potential witnesses. The supplemental response claims that certain clients of Rolling Lawns have "knowledge of Plaintiff working overtime for Defendants" and "receiving cash payments."

We request that the response be amended to include the following information for each witness who is alleged to have "knowledge of Plaintiff working overtime for the Defendants": (1) the specific workweek(s), (2) the number of hours the Plaintiff allegedly worked during each such workweek, and (3) how each customer knows such information. Also, you claim that the clients have knowledge of "receiving cash payments." We respectfully request that you provide the following information for each witness alleged to have knowledge of "cash payments": (1) the date(s) of each payment, (2) the amount of the payment (3) the payor, (4) the payee, (5) the reason for the payment, and (6) how each customer knows such information.

Please also provide your availability for a meet and confer on or before August 7, 2024.

Respectfully,

*Steven J. Moser*

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